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Attorneys for Debtors  
and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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<b>In re</b>	:
	:
<b>LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i>,</b>	:
	:
<b>Debtors.</b>	:
	:
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**Chapter 11 Case No.**  
**08-13555 (JMP)**  
**(Jointly Administered)**

**DECLARATION OF ALFREDO R. PÉREZ IN SUPPORT OF ORDER TO  
SHOW CAUSE AND NOTICE FIXING THE OBJECTION DEADLINE, REPLY  
DEADLINE, AND HEARING DATE ON THE DEBTORS' AMENDED MOTION  
FOR APPROVAL OF THE DISCLOSURE STATEMENT AND RELATED RELIEF**

ALFREDO R. PÉREZ, being duly sworn, hereby declares pursuant to section  
1746 of title 28 of the United States Code:

1. I am an attorney admitted to practice before this Court and a member of  
Weil, Gotshal & Manges LLP, attorneys for Lehman Brothers Holdings Inc. and its affiliated  
debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (together,  
the "Debtors").

2. I am submitting this declaration in support of the Order to Show Cause  
being submitted contemporaneously herewith to schedule a hearing (the "Hearing") and establish  
the objection and reply deadlines as to the Debtors' amended motion (the "Amended Motion")

for approval of their Proposed Disclosure Statement<sup>1</sup> and entry of the Proposed Disclosure Statement Order [ECF No. 18126].

3. The Debtors request that the Hearing be scheduled for **August 30, 2011 at 10:00 a.m. (Eastern Time)**. The Debtors further request that the Court order that objections and responses, if any, to the Amended Motion be filed and served so as to be received no later than **August 11, 2011 at 4:00 p.m. (Eastern Time)** and that replies or an omnibus reply to such objections and responses, if any, to the Amended Motion be filed and served so as to be received no later than **August 23, 2011 at 4:00 p.m. (Eastern Time)**.

4. The Debtors anticipate that, as with other significant motions in these cases, numerous parties in interest will seek to respond to the Amended Motion and the Proposed Disclosure Statement. Accordingly, the Court and all parties in interest would benefit from the establishment of the objection/response and reply dates proposed in this declaration. Ordinarily, the objection/response deadline for motions in these cases is seven days prior to the applicable hearing date, and the reply deadline for such objections or responses is two days prior to the applicable hearing date.<sup>2</sup> The proposed objection/response deadline would provide all parties in interest with more than six weeks from today to consider the Amended Motion and the Proposed Disclosure Statement. Thus, there is no harm to parties in interest by entry of the proposed Order to Show Cause. Moreover, the proposed reply deadline would provide the Court and all parties in interest with adequate and sufficient time to prepare for the Hearing.

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<sup>1</sup> Capitalized terms that used but not defined here have the meanings ascribed to them in the Amended Motion.

<sup>2</sup> The *Second Amended Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures*, dated June 17, 2010 [Docket No. 9635], provides that (a) the deadline to file objections or responses to pleadings shall be (i) 4:00 p.m. (Eastern Time) on the date that is seven (7) calendar days before the applicable hearing date or (ii) any date and time otherwise ordered by the Court and (b) unless otherwise ordered by the Court, replies to such objections or responses shall be filed and served on or before 12:00 noon (Eastern Time) on the day that is at least two (2) business days prior to the date of the applicable hearing.

5. Therefore, the Debtors request that the Court enter the Order to Show Cause and schedule the Hearing for **August 30, 2011 at 10:00 a.m. (Eastern Time)**, that objections and responses, if any, to the Amended Motion be filed and served so as to be received no later than **August 11, 2011 at 4:00 p.m. (Eastern Time)**, and that replies or an omnibus reply to such objections and responses, if any, to the Amended Motion be filed and served so as to be received no later than **August 23, 2011 at 4:00 p.m (Eastern Time)**.

Dated: July 6, 2011  
New York, New York

/s/ Alfredo R. Pérez

Alfredo R. Pérez